



May 13, 2022

OPEN MEETING AGENDA ITEM

Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

RE: Docket No. E-01345A-21-0240, in Support of Community Solar

Madam Chair and Commissioners,

The Coalition for Community Solar Access (CCSA), a national coalition of businesses and non-profits working to expand customer choice and access to solar for all American households and businesses through shared solar programs, **encourages you to vote yes on Commissioner Kennedy's Proposed Amendment Number 1**, which establishes a working group to explore various considerations for enabling competitive community solar in Arizona.¹ This approach provides a collaborative way to move forward with community solar, by allowing the commission to do so thoughtfully through a working group that includes staff and a broad set of stakeholders, including Arizona Public Service. CCSA recommends that the working group be instructed to conclude its work in advance of a vote at the October Open Meeting to ensure a swift and efficient process.

Community solar fills a key need between rooftop solar and utility scale solar, with projects typically ranging from 2 – 20 megawatts. The projects are small enough to be located closer to the populations they serve while also being big enough to take advantage of economies of scale. It enables opportunities for residential, small business and nonprofit customers to participate in distributed generation who otherwise would not have the ability to do so because they don't own their home or business or can't put solar on their roof. Further, community solar provides an avenue for the state's income qualified communities and service organizations, who have historically been left out of the clean energy transition, to access the benefits of solar including guaranteed savings on their monthly electric bills. These projects, and their associated benefits, will be funded through private capital and competitive markets enabling the state to modernize and make significant upgrades to the electrical grid without any risk to ratepayers.

Currently, Arizona is missing this important, fast-growing opportunity within the solar sector. Twenty-two states and the District of Columbia have policies that enable third-party community solar. Among these states, there are approximately 1,500 projects for a total of 3.5 gigawatts of capacity and these projects serve as many as 600,000 customers.² This equates to billions of dollars of private capital currently being deployed into neighboring states. **Not only is Arizona failing to seize this opportunity to deploy privately funded clean energy resources, but it is also forgoing thousands of quality jobs and vast economic development.**

¹ Commissioner Kennedy Proposed Amendment No. 1, *available here*
<https://docket.images.azcc.gov/E000018712.pdf?i=1652155834150>.

² See Coalition for Community Solar Access, Resources, *available here*
<https://www.communitysolaraccess.org/resources/>.



Community solar provides bill savings to customers through monetary bill credits. It also allows for innovative uses of brownfield sites, opportunities to support development within disproportionately impacted communities and additional ways for farmers to diversify their incomes. Penn State, Michigan State, and the University of New Mexico have conducted studies that demonstrate that community solar programs have the ability to create thousands of jobs, increase property tax revenue for both urban and rural communities, provide additional revenue opportunities for farmers and ranchers, and enable hundreds of millions of dollars in statewide economic benefits.³ Solar companies stand ready to come to Arizona today to deploy their private capital into community solar projects.

In addition to the Kennedy amendment, CCSA is also aware that a new docket has been opened regarding a statewide initiative around community solar. We are thrilled to see this level of excitement for community solar within the Commission and believe **these two items need not be mutually exclusive**. While CCSA encourages moving forward with the Kennedy amendment for Arizona Public Service (APS) within their Renewable Energy Standard (RES) Implementation Plans, the new docket will also be a useful tool for enabling community solar in other utility service territories, as well as information gathering on community solar broadly.

Please vote affirmatively for Commissioner Kennedy's community solar amendment in the APS RES docket at the May Open Meeting.

Respectfully,

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³ See The Potential Economic Impact of Community Solar in New Mexico, UNM Bureau of Business & Economic Research, *available here* <https://www.sol-utionnm.org/wp-content/uploads/2021/01/NM-2021-Community-Solar-Impact-Report.pdf>; Michigan Community Solar: An Economic Assessment, *available here* https://static1.squarespace.com/static/603804d68a94027d64852e25/t/616ed9ed4b5052410ff788c9/1634654701678/MSU+Community+Solar+Report_FINAL.pdf; Potential Economic Impact of Community Solar in Pennsylvania, *available here* https://03b6d275-ec98-4872-923e-592df4b19126.filesusr.com/ugd/678dcb_2bef0068ce3d4c91ae465b3c99098ca9.pdf